

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA (READING)**

| | | |
|----------------------------------|---|--------------------|
| In re: Robert Joseph Kroboth and | : | Chapter 12 |
| Melanie Ann Kroboth | : | |
| Debtors | : | Case 4:16-bk-13342 |

HEARING DATE: May 28, 2020 11:00 a.m.

**NOTICE OF MOTION, RESPONSE DEADLINE
AND HEARING DATE**

Fulton Bank, N.A, has filed a Motion to Dismiss for Failure to Make Plan Payments pursuant to 11 U.S.C. § 1208 with the Court.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before May 14, 2020 you or your attorney must do all of the following:

- (a) file an answer explaining your position at:
Clerk's Office
United States Bankruptcy Court
Eastern District of Pennsylvania
The Madison Building
400 Washington Street, Suite 300
Reading, PA 19601

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

- (b) mail a copy to the movant's attorney:
Scott M. Klein, Esquire
Brown McGarry Nimeroff LLC
158 W. Gay Street, Suite 200
West Chester, PA 19380
sklein@bmnlawyers.com
Tel.: 610-755-3311/Fax: 484-631-1302

(c) and a copy to the following:

David B. Schwartz, Esquire
Goodman Schwartz
514 Fullerton Avenue, Suite 2
Whitehall, PA 18052
610-434-2023
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Counsel for debtor

Thomas I. Puleo, Esquire
KML Law Group, P.C.
701 Market Street, Suite 5000
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*Counsel for United States of America, Acting through USDA,
Commodity Credit Corporation*

Michael B. Joseph, Esquire
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Chapter 12 Trustee

Office of the U.S. Trustee
833 Chestnut Street
Suite 500
Philadelphia, PA 19107
(215) 597-4411
USTPRegion03.PH.ECF@usdoj.gov
United States Trustee

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.
3. A hearing on the motion is scheduled to be held before the Honorable Patricia M. Mayer on May 28, 2020 at 11:00 a.m. in United States Bankruptcy Court, Eastern District of Pennsylvania, The Gateway Building, 201 Penn Street, 4th Floor Courtroom, Reading, PA 19601. Unless the court orders

otherwise, the hearing on this contested matter will be an evidentiary hearing at which witnesses may testify with respect to disputed material factual issues in the manner directed by Fed. R. Bankr. P. 9014(d).

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
5. You may contact the Bankruptcy Clerk's office at (610) 208-5040 to find out whether the hearing has been canceled because no one filed an answer.

BROWN McGARRY NIMEROFF LLC

Dated: April 30, 2020

By: [/s/Scott M. Klein](#)
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